

### **REMARKS**

Claims 1 and 17 have been amended, and claim 10 has been cancelled. No new matter has been added. Claims 1-10 and 11-22 are pending, of which claims 1, 11, 15, and 17 are independent.

#### **Claim Rejections under 35 USC §112**

Claims 1 and 17 have been rejected for failing to provide sufficient antecedent basis for the limitation “managing items”. Applicants submit that the term “managing items” is well understood by one of ordinary skill in the art and is further sufficiently supported by the specification. As set forth in the specification, in the illustrative embodiment the items that are managed may be components within a storage area network. Additionally, as set forth in the specification, Java based plug in applications may be further managed in accordance with claims 1 and 17. These illustrative items are merely representative of samples of items which may be managed in accordance with the present invention as understood by one skilled in the art, but are sufficient to establish proper antecedent basis for the language in claims 1 and 17. In light of this, Applicants submit that the Examiner’s rejection under 35 USC §112 has been overcome, and request withdrawal of the Examiner’s rejection to claims 1 and 17.

#### **Claim Rejections Under 35 U.S.C. §103(a)**

Claims 1-22 stand rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over Bach et al. (United States Patent Number 6,141,660, hereafter “Bach”) in view of Gorthy (United States Patent Application Number 20030051008, hereafter “Gorthy”). For the reasons set forth below, Applicant respectfully traverses these rejections.

#### **Summary of Claimed Invention**

The present invention generally relates to a scripting service that translated browser requests into command line interface (CLI) commands. The translated CLI commands may be displayed to the user to help the user understand the relationship between browser requests and CLI commands. Furthermore, the commands may be forwarded to a CLI client, or stored in a script which can be executed.

Amended independent claim 1 (and claims 2-9 which are dependent thereon) is directed to a method performed in an electronic device that runs a management application on the electronic device, wherein the management application can manage items within a storage area network. The management application can be associated with a web browser client, such that the management application can receive a request from the web browser client. Upon receiving a request at the management application from a web browser client, the request is translated into one or more command line interfaces (CLI) commands.

Independent claim 11 (and claims 12-13 which depend thereon) is for use with a web server, wherein a method for receiving requests from a client using a web browser, translating the requests into a command line interface command and recording the commands in a script. The script can then be forwarded to the client for display on a display device

Independent claim 15, and dependent claim 16 which depends on claim 15, is directed to an electronic device that comprises a network interface, a management application and a scripting service. The network interface provides a mechanism by which the device can interface with a network. The management application can process request that are received by clients from the network via the network interface. Furthermore the scripting service can receive the requests from the client and translate the request into a command line interface (CLI) command.

Independent claim 17, and dependent claims 18-22 which depend on independent claim 17, is directed to a medium for use in an electronic device associated with a network. The electronic device can run a management application such that items within a storage area network can be properly managed. The medium further holds instruction for performing a method. The method includes the steps of running a management application on the electronic device, receiving a request tat the management application via a web browser client, and translating the request into one or more CLI commands.

#### Summary of Bach

The Bach patent discusses a method and system for generating an object-oriented application that accesses a hierarchical database. In generating this application, a database

description and record which describe the hierarchical database are defined and further used in creating a specification for the database. This specification is then used in generating a class specification for the database using a command line interface of a class definition tool. The command line interface class definition tool is capable of parsing data contained in the class specification and generating class definitions for objects that encapsulate data retrieved from the database. As detailed in claims 1, 6 and 11 of Bach, the use of a command line interface simply allows a user to choose between a variety of commands for use in capturing a database, capturing a record, or associating a record with a database. As reference by the Examiner, Column 17, lines 3-5 of Bach state, "Using the CLI, the user can enter commands one by one, or can run a command script that contains all of the commands." The entering of commands or running of a script is solely related to the generation of an application program for accessing a hierarchal database. Furthermore, as admitted by the Examiner in the Office Action, the Bach reference does not teach or suggest translating the request into one or more command line interface commands.

#### Summary of Gorthy

Gorthy describes a method and system for configuration various network devices, including routers, switches and optical components. In configuring these devices, a user can use various configuration schemas, including a XML configuration schema. When working with a network device that typically is configured using a command line interface, the command line interface can be converted to a XML configuration format. The use of a XML format is more user friendly as compared to a CLI format, thereby allowing a user to configure a network device with little knowledge of proper use of the CLI format. As detailed a line number 0035 on page 2,

"In other words, the command storage module 140 is queried through the CLI; available commands are returned through the CLI; and new configuration commands are re provided to the router 120 through the CLI. Unfortunately, the CLI is difficult to manage and requires highly skilled technicians for even simple tasks."

In light of such language, it is evident Gorthy seeks to avoid the CLI interface and instead replace the interface with an appropriate replacement method such as an XML method.

Argument

The combination of Bach in view of Gorthy cited by the Examiner fails to teach or suggest all of the limitations of amended independent claim 1. Specifically, neither Bach nor Gorthy discusses the receiving of a request at the management application by a web browser client wherein this request is translated into one or more command line interface commands. Furthermore, as set forth previously, the Examiner clearly states that he Bach art fails to teach the translating of a request into a CLI command. Furthermore, the Gorthy art fails to teach or suggest the translating of a request received by the management application into a command line interface in accordance with the present invention.

The section of Bach cited by the Examiner at col. 17, line 3-5 merely states that the command line interface, when used in conjunction with the hierarchical database structure of Bach, can be used to enter commands or to run a command script. The Bach reference fails to teach or suggest an application manager, as set forth in the present invention, as well as an interaction between a web browser client and the management application such that a translated request is provided in a command line interface format. Furthermore, Bach discloses the use of the command line interface in generating an application program for accessing a hierarchical database wherein the CLI is used to control the capturing of various databases, and records within the databases, such that a final class definition derived from the database specification can be generated. This class definition is instantiated in an object framework such that the object framework is utilized in retrieving data from the hierarchical database structure.

In contrast to the cited section of Bach, the claimed invention discusses the use of a management application running on an electronic device *interface with a network* wherein the management application can receive a request from a *web browser*, and further translate the request into one or more command line interface commands.

In regards to the cited section 0034 Gorthy, Applicants submit that this section describes the prior art of Gorthy as directed to the configuration of a router. As set forth in this paragraph, a user can interact with a router using the command line interface such that the router can be update or the router parameters can be changed. The receipt of a request by a management

application from a web browser client, wherein this request is subsequently translated into one or more command line interface commands is clearly neither taught nor suggested by the cited language of Gorthy. Furthermore, as outlined in paragraph 0035 of Gorthy, the Gorthy application seeks to avoid the use of the CLI, as, “the CLI is difficult to manage and requires highly skilled technicians for even simple tasks.” In light of this, Gorthy alone or in combination with Bach fails to teach or suggest the present invention.

Addressing the cited text at paragraph 0052 of Gorthy, a method for configuring a router is provided. An XML configuration command is provided, as well as the router make and model information, such that an appropriate configuration schema is selected. Using this configuration schema a CLI based command is generated, verified, and subsequently used to configure the router appropriately. As evidenced by the language of Gorthy, the conversion into a command line interface command from an XML command only occurs such that the CLI command can be passed to a router which can only be configured using a CLI command. Gorthy fails to teach or suggest the management application of the present invention, wherein the management application receives a request from a web browser and translated the request into a CLI command. Gorthy further fails to teach or suggest the management of items within a storage area network as described in amended claim 1.

In light of the above arguments, Applicants respectfully request the passage of claim 1 to allowance. Applicants further ask the Examiner to pass claims 5 and 9 to allowance as the rejections of dependent claims 5 and 9 were based on identical arguments as those used in the rejection of dependent claim 1.

Claims 2-10 are further rejected under 35 U.S.C. §103(a) in view of Bach and Gorthy. Applicants respectfully traverse these rejections. Claims 2-10 are dependent claims, which serve to further limit independent claims 1. Applicants submit that in view of the aforementioned arguments in regards to the patentability of claim 1, claims 2-10 are allowable by their very nature as dependent claims.

Applicants further submit that, in regards to claim 2, the cited language on paragraph 0034 of Gorthy fails to teach or suggest the storing of CLI commands that result from the

translating of these commands in accordance with the present invention. The stored commands of Gorthy serve to simply evidence the present configuration of the router with which the user is communicating. These commands have not been translated from a request provided by a web browser client into a CLI command, but rather are in a CLI format to begin with. Such an assertion is supported at paragraph 0034 which reads, "The system administrator can review available configuration commands and bounds-*usually in a CLI format*- by accessing and reviewing the commands stored in the command storage module." In light of such language, applicants submit that the cited art to Bach and Gorthy, alone or in combination, fail to teach or suggest the present invention.

Regarding the Examiners rejection of claim 4, Applicants respectfully submit that the cited language of the Examiner fails to teach or suggest the display of CLI commands that are the result of the translating of a request received by a web browser into a CLI command. In light of this, Applicants submit that claim 4 is in condition for allowance.

In regards to the Examiners rejection of claim 6, Applicants submit that the stored commands of Gorthy are simply illustrative of the router configuration and are not CLI commands generated following the translation of a request from a web browser. Applicants submit that the storage of translated CLI commands in a script in accordance with claim 6 of the present invention is neither taught nor suggested by the cited art. Applicant's therefore request that the Examiner pass claim 6 to allowance. Applicants further submit that the execution of a script of claim 7, wherein the script contains translated commands from the web client that have been converted into CLI commands, is neither taught nor suggested by the cited language at column 17, lines 54-55 of Bach.

Applicants submit that the responding to the request at a management application from a web browser client, in accordance with dependent claim 8, is neither taught nor suggested by the cited language of Bach, as Bach discloses the use of a class definition tool which uses command specifications generated by using a command line interface. In light of this, the cited language of Bach clearly teaches away from pending claim 8 which provides for the responding to the request by a web browser client independently of the translating of the request into one or more

CLI commands. Additionally, the applicants respectfully submit that the Examiners rejection to claim 10 has been rendered moot in view of the cancellation of claim 10.

Claims 11-14, of which claims 11 is independent, are additionally rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over Bach and Gorthy. Claims 11-14 are method claims equivalent to claims 1-9, wherein the method is practiced in conjunction with a web server. The Examiners has rejected claims 11-14 using identical arguments as set forth in the rejection to claims 1-10. Applicants respectfully submit, in light of the arguments set forth regarding independent claims 1, and claims 2-9 which depend on claim 1 for support, that the Bach and Gorthy art, alone or in combination, fails to teach or suggest the present invention. Applicants further submit that claims 15-16 and 17-22, which were rejected using identical arguments as those used in rejecting claims 1-9, are further in condition for allowance in light of the prior arguments setting forth the patentability of claim 1-9. In light of said arguments, the Applicants respectfully ask the Examiner to withdraw the rejection to claims 15-22 and pass them to allowance.


**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-084 from which the undersigned is authorized to draw.

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Respectfully submitted,

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